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ANGELA BIGGINS

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

ANGELA J. BIGGINS,

Plaintiff,

vs.

BIOMET, INC.; BIOMET  
ORTHOPEDICS, LLC; and BIOMET  
U.S. RECONSTRUCTION, LLC;

Defendants.

Case No.: 2:20-cv-02247-JCM-NJK

Honorable James C. Mahan

Honorable Nancy J. Koppe

**JOINT REQUEST FOR EXTENSION  
OF TIME TO FILE DISMISSAL  
PAPERS**

Complaint Filed: December 11, 2020

1 Plaintiff Angela Biggins (“Plaintiff”) and Defendants Biomet, Inc., Biomet  
 2 Orthopedics, LLC, and Biomet U.S. Reconstruction, LLC (“Defendants” and collectively  
 3 with Plaintiff, “the Parties”), by and through their undersigned counsel, hereby request an  
 4 extension of the Court’s August 19, 2021 Order (ECF No. 20) to submit dismissal papers.  
 5 In support of their request, the Parties state as follows:

6 The Parties reached an agreement to settle this action and accordingly, on May 6,  
 7 2021 filed a Joint Notice of Settlement with this Court. ECF No. 19. While the  
 8 settlement agreement has now been finalized by both Parties, COVID-19 has presented  
 9 unforeseen challenges that require additional time for the settlement to be funded and  
 10 finalized. At this point, the Defendants anticipate funding this settlement by the end of  
 11 October 2021. Settlement payment is necessary before a stipulation for dismissal and  
 12 release can be effectuated by the Parties. Accordingly, the Parties request an extension of  
 13 the Court’s current August 25, 2021 deadline up to and including November 5, 2021 in  
 14 order for the resolution to be completed and a stipulation of dismissal to be filed with the  
 15 Court. The Parties do not seek to unduly delay the proceedings but need additional time  
 16 to complete the settlement in light of the multiple factors affecting the resolution.

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1           **WHEREFORE**, the Parties respectfully request this Court grant an extension of  
2 up to and including November 5, 2021 for the Parties to file a stipulation of dismissal in  
3 this action.

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5 Dated: August 25, 2021

**FAEGRE DRINKER BIDDLE & REATH LLP**

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7 By: /s/ Theodore E. O'Reilly

8 TARIFA B. LADDON  
9 THEODORE E. O'REILLY

10 Attorneys for Defendants  
11 BIOMET, INC.; BIOMET ORTHOPEDICS,  
12 LLC; and BIOMET U.S.  
13 RECONSTRUCTION, LLC

14 Dated: August 25, 2021

**WETHERALL GROUP, LTD**

15  
16 By: /s/ Peter C. Wetherall

17 PETER C. WETHERALL

18 Attorneys for Plaintiff  
19 ANGELA BIGGINS

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21 GRANTED. The Court is not inclined, however, to grant  
22 further extensions.

23 IT IS SO ORDERED.

24 Dated: August 26, 2021

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26   
27 Nancy J. Koppe  
28 United States Magistrate Judge